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Vincent J. Fusaro
Standardization Section
Fresh Products Branch-Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, SW., Room1661, South Building, Stop 0240
Washington, D.C. 20250-0240

Reference: February 26th, 2008; Federal Register Vol. 73, No. 38, pgs. 10185-10186 AMS Docket #FV-07-0140

Dear Mr. Fusaro:

On behalf of the California Table Grape Commission, we would like to comment on the U.S. Department of Agriculture, Agriculture Marketing Service (USDA-AMS) proposal to revise the U.S. Standards for Grades of Table Grapes (European or Vinifera Type) to include a tolerance of 5 percent for table grape shatter from grading as defect in recognition of the evolution of consumer bags and clamshells for product en route or at destination only.

In 2005, we conducted a thorough study of consumer attitudes to grape shatter. The study included an online survey of more than 1,500 North American consumers and three focus groups with primary grocery shoppers in three different regions of the country. The results of that study showed first, that consumers are familiar with grape shatter, with 98 percent reporting that they have purchased grapes with some of the berries off the stem. Second, the survey found that, "Overall, consumers do not perceive fresh grapes to be of poor quality if grapes are detached from the stem." The survey found little or no difference in consumer perceptions of grape with shatter levels up to 10 percent.

The proposed 5 percent tolerance is well within the levels where consumers consider the grapes to be in good or excellent condition.

Regards,

Kathleen Nave

President